



MCARTHUR LIBRARY

November 30, 2017

To Whom It May Concern

Re: Petition to Reconsider the Decision on a Previous FCC Appeal on the USAC Schools
& Libraries Filing Window

FCC Docket #No. 02-6 (submitted 8/31/17 and denial decision posted 10/31/17 in
*DA 17-1048 STREAMLINED RESOLUTION OF REQUESTS RELATED TO ACTIONS
BY THE UNIVERSAL SERVICE ADMINISTRATIVE COMPANY*

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Basic Contact Information

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McArthur Library's Billed Entity #: 121341 and FCC Registration Number: 0012272613

Brief summary of the events:

- My appeal relates to an issue that started in 2016 and funding that should have been able to be spent via the e-rate program in 2016. I do not want to wait for the entire 2018 e-rate process to be able to make this purchase of wifi hardware that will benefit my public library.
- In 2016, I made an e-rate request to purchase Wifi access points (Category 2) for my library. The funding was approved but because I had combined the hardware cost and licensing/software costs as one line item on the Form 486, when it should have been 2 lines for each access point, the vendor requested that I file an appeal with USAC to re-submit the Form 486. I filed this appeal with USAC.
- This appeal took more than 5 months for some reason (despite quite a lot of follow-up on my part) and when a decision came in, it was not in our favor – the appeal was declined. USAC had told me to file the Form 470 Category 2 and Form 471 in 2017 for these wifi access points again, so I did that. However, by the time I received the appeal decision in 2017, the 471 Window for 2017 had closed.
- USAC advised that I should still submit the Forms 470 and 471 for the Category 2 purchase (even though the Form 471 would be file late) and then file an appeal immediately with the FCC so that the 471 could be accepted and the funding could be approved. I did as USAC suggested, filed all forms and submitted this appeal, but it was denied without an explanation from the FCC, so I am appealing that decision.
- Basically I should have been able to make this purchase in 2016 but we have still not purchased our Wifi access points because of the length of time it took USAC to make a decision.

Relevant Timeline

Date	Activity
2/11/16	Form 470 (#160026503) for 2016 Filed – Included Category 2 Service Request for Wireless Access Points
7/21/16	Form 471 (#161061262) for 2016 Filed for Category 2 Wireless Access Points
8/22/16	Funding Commitment Decision Letter for Category 2 purchases received and approved
11/22/16	Form 486 (#25667) for Category 2 Purchases Submitted. Once the vendor received the 486, this is when they advised that I should appeal and ask to submit a new 486 because the hardware and software/licensing costs had been combined and apparently should have been left separate.

12/9/16	<p>Request for Appeal to USAC Made – Appeal 27414.</p> <p>Text of appeal:</p> <p><i>On Form 471 # 161061262 (Funding Year 2016 Category 2 Wifi), I had combined two items into one line item and would like those split out. On the FRN 1699143011, the \$484.88 unit price includes: \$310.18 - Cisco Meraki Access Point \$174.70 - A 5-year Enterprise Cloud Controller License for Cisco Meraki Access Point. The total # of access points is 7. The total # of licenses is 7. So the FRN total number is still correct. The vendor/service provider thought I should make it clear that the access point and license had been combined (by me) into one line item cost. The vendor requires confirmation that this is okay and the change so that access points and licenses are on their own line(s) before they will process the order and make the shipment.</i></p> <p>(This appeal would eventually take more than 5 months to receive a denial decision.)</p>
4/5/17	Form 470 (# 170078902) for Category 1 Purchases Submitted (I would have included Category 2 on this as well but I was still waiting on the USAC Appeal Decision)
5/11/17	<p>471 Form Window Closure Date for 2017</p> <p>Form 471 (#171047749) for Category 1 Submitted (I couldn't submit the Form 471 for Category 2 because I was still waiting on the 2016 Appeal Decision)</p>
5/20/17	<p>Decision from USAC Received on Appeal 27414. Appeal had been declined.</p> <p>Between December 9th and May 20th, I had filed 4 cases (141594, 145873, 164555, and 179342) to request that this appeal receive a decision – hence it took over 5 months to receive a decision despite my efforts.</p> <p>At this stage, I was advised by USAC to go ahead and file a new Form 470 for Category 2 for 2017 (starting the process all over again for my wireless access point purchases) and also file the Form 471 late for Category 2 purchases (since the window had closed May 11th), and then to immediately appeal with the FCC to accept the Form 471 even though I had submitted the 471 late. USAC advised to explain what had happened and explain that because they had taken so long to decide on the first appeal, I had missed the 471 window deadline through no fault of my own.</p>
5/26/17	Form 470 (#170083432) for Category 2 Purchases Submitted
8/31/17	Form 471 (#171049563) for Category 2 Submitted
8/31/17	<p>FCC Appeal Made through ECFS (previous appeal is attached to this document)</p> <p>Confirmation Number: 20170831083478762</p>

	Proceeding(s): 02-6 : In the Matter of Schools and Libraries Universal Service Support Mechanism
10/31/17	FCC CC Docket No. 02-6 Released – Advises that my appeal to the FCC was denied
11/30/17	This letter is being submitted to appeal the 10/31/17 FCC decision.

Ideally, I would like to not have to wait until 2018 to start this whole process again.
Thanks in advance for your consideration of this request to re-consider the appeal decision.

Yours sincerely,



Jeff Cabral
Library Director